Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Telecommunications Relay Services	)	
and Speech-to-Speech Services for	)	CG Docket No. 03-123
Individuals with Hearing and Speech	)	
Disabilities	)	
	)	
Access to Emergency Services	)	

REPLY COMMENTS OF INTRADO INC.

Intrado Inc. (Intrado)[1] hereby submits these reply comments in response to the Federal Communication Commission's (Commission) Notice of Proposed Rulemaking (NPRM) regarding the above captioned proceeding.[2]

DISCUSSION

Over the past 25 years, Intrado has provided solutions that support the delivery of E9-1-1 calls and associated data to public safety answering points. Intrado's experience began in support of traditional plain old telephone service (POTS) then included cellular telephones, and most recently for Voice over Internet Protocol (VoIP) services. In each case, the mechanism for delivery of emergency calls was at first unsophisticated and almost ad-hoc but evolved to a standard, reliable, "native" model. The value of delivering all emergency calls through a standard, native mechanism cannot be understated.

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[1] Founded in 1979, Intrado (NasdaqNM: TRDO) is the nation's leading provider of sophisticated solutions that identify, manage and deliver mission critical information for telecommunications providers and public safety organizations.

[2] *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities,* Notice of Proposed Rulemaking (NPRM), FCC 05-196 (rel. Nov. 30,2005).

Intrado strongly supports the Commission's efforts to require access to E9-1-1 services through Telephone Relay Services (TRS), Video Relay Services (VRS) and Internet Protocol (IP) Relay service. In addition, Intrado suggests that the Commission require the providers of calls centers operated in support of telematics services and central station alarms, as well as for multi-line telephone systems (MLTS) systems ensure access to emergency services. Several companies have invested in infrastructure to support VoIP Service providers in order to meet the recent FCC mandate.[3] This investment can further support the delivery of calls from all the above mentioned sources as standard, native emergency calls. By extending the requirement for native delivery of emergency calls from these sources, the industry will be motivated to accelerate the rollout of the infrastructure and potentially reduce the cost of the service through a broader revenue base. Therefore, Intrado encourages the Commission to extend this requirement of native delivery of emergency calls to all origination points where the public has a reasonable expectation of full E9-1-1 service.

With respect to the scope of this NPRM, Intrado encourages the Commission to act on TRS, VRS and IP relay services. This industry has seen a proliferation of IP-enabled services in place of traditional TRS services such as Text-to-Voice based TTY services. Setting clear guidelines for E9-1-1 requirements for these services is in the public interest.

While Intrado strongly supports providing TRS users access to emergency services, we recognize there are challenges. We wish to provide the Commission an overview of solutions that we have developed or are developing, so that the Commission can promulgate rules that are technically and economically feasible. Given that Intrado is a leading provider of E9-1-1 solutions for telecommunications carriers, Intrado is in a unique position to provide the Commission with a more comprehensive view of how to best provide end users with emergency services, regardless of the device employed.

In the NPRM, the Commission sought comment on the following questions:

1) Whether VRS and IP Relay providers can provide access to emergency calls

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[3] *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, WC Docket Nos. 04-35 & 05-196, FCC 05-116 (rel. June 3,
2005).

2) Whether VRS and IP Relay providers should be subject to user registration

3) Whether the FCC should mandate a national PSAP and/or user database that could be accessed by all the providers

4) How much time the Commission should allow providers to implement the solutions proposed in the NPRM[4]

1) Whether VRS and IP Relay providers can provide access to emergency calls

Intrado recognizes the need to ensure emergency services are provided to the TRS community. There are mechanisms that exist today to enable VRS and IP Relay providers the basic functionality of obtaining the caller's location information and, in real-time, relating that information to the correct PSAP, while also routing the caller to the appropriate PSAP; thus, ensuring the dispatching of the correct responding agency. Intrado has developed an offering (Private Call Center 9-1-1) with Sorenson Communications, Inc. (Sorenson) that provides such a solution in a three-phased manner.[5] This approach allows Sorenson to identify the VRS call as a 9-1-1 emergency call; prioritize the caller over other queued customers; obtain customer's location information and conference the Intrado Emergency Call Relay Center (ECRC) via a dedicated line. The Intrado ECRC then determines the corresponding Public Safety Answering Point (PSAP) based on the address information supplied to them by Sorenson, and ultimately routes the call to the appropriate PSAP.

In support of this phased approach for VRS 9-1-1 calls, together with Sorenson, Intrado has developed a Web-based application, where the Sorenson communication assistant manually enters the callers address as it is communicated to them. The information is sent to Intrado where our databases are queried and the proper PSAP routing information is provided and then transferred to the PSAP via the 24x7 administration line.

In the coming months, Intrado will complete development of the solution that will enable the call to be placed on our IP peering network, thereby delivering the call natively into 9-1-1 network. This will ensure that the 9-1-1 call is given the proper priority; that it contains both the caller's location and call

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[4] See NPRM

[5] *See* Comments of Sorenson Communications, Inc. CG Docket No. 03-123, at 4

back number and that the end user is afforded the same level of emergency services enjoyed by those using a wireline phone.

While Intrado is not suggesting that every VRS provider must utilize the same technology, we do maintain that E9-1-1 for VRS users can be accomplished ubiquitously today, and the methods by which it is provided can be transparent to the end user while enabling emergency service support.

2) Whether VRS and IP Relay providers should be subject to user registration &
3) Whether the FCC should mandate a national PSAP and/or user database that could be accessed by all the providers

Intrado does not advocate the establishment of rules requiring user registration, and if such a requirement were to be established, the technology and/or mechanisms exist today to support this directive. Intrado is not in favor of a mandated national PSAP database since such a database exists today. However, should a requirement be placed on the industry, Intrado encourages the Commission not to duplicate services that are currently in place; rather, the Commission should look to utilizing existing services and support further enhancements to them, which will in turn best meet the Commission's directive.

Today, Intrado's internal databases currently maintain similar information for the delivery of emergency calls for wireline, wireless and now, VoIP customers. While Intrado is not insinuating there is a correlation between a VoIP call and a VRS/IP Relay call, we do maintain that the database information requirements are similar and are complimentary to each other. Furthermore; Intrado utilizes technology today that can support the manual provisioning of customer information. In addition, there are 3rd party vendors developing promising technology that will allow the real-time support for automatic location identification without any manual input of user information.

In addition, some initial comments in this NPRM raised concerns over privacy and the security of subscriber information.[6] In the 25 years that

[6]See Comments of Verizon, CG Docket No. 03-123, at 5; Comments of NJ Division of the Ratepayer Advocate, CG Docket No. 03-123, 6-7; Comments of Sprint Nextel, CG Docket No. 03-123, 8-9; Comments of Hamilton Relay, Inc., CG Docket No. 03-123, at 3; Comments of Communication Services for the Deaf, CG Docket No. 03-123, 14-15.

Intrado has been providing 9-1-1 services, it has placed a premium of maintaining the highest level of security for a subscriber's 9-1-1 data. Since the aftermath of 9/11, we have seen an increased adoption throughout the 9-1-1 industry to further maintain and safeguard the privacy and security of this information. That said, we believe that any requirement to support a database or user registration can be accomplished today and can meet the stringent requirements to maintain both user privacy and security of the network and corresponding databases.

4) How much time the FCC should allow providers to implement the solutions proposed in the NPRM

As previously stated, Intrado has several solutions in place today that provide VRS and IP Relay provider's emergency services support today through manual provisioning of user information that, in turn, establish the relevant PSAP routing instructions. Additionally, through our development work with technology that can automatically detect the location of end users, Intrado believes there will be viable solutions employing this methodology within the next twelve (12) to eighteen (18) months.

It should be noted that Intrado does not support one technological solution over another; rather, we believe that any requirements imposed on providers should not restrict the development of any solution that may result in better support for 9-1-1 call delivery. That being said, any requirements the Commission may adopt should be reasonable and take into consideration the comments provided by those industry participants that are developing automatic location determination technology. Additionally, Intrado encourages the Commission to further understand the need for database security and to examine systems that are in place today, so as not to duplicate or compromise PSAP database information. Finally, Intrado offers to brief the Commission further on its solutions and welcomes the opportunity to provide the Commission with additional information on how best to ensure end users of emerging technology, such VoIP and IP Relay, have access to emergency services.

CONCLUSION

As stated above, Intrado fully supports the Commission's efforts to ensure that end users of TRS and IP Relay have access to emergency services. Intrado has solutions in place today that can provide these services when an end user's location is known, and there are solutions currently in development that will enable an end user to obtain emergency services via

automatic location technology. Intrado offers to brief the Commission further on these solutions and encourages the Commission to solicit industry feedback prior to promulgating rules on this docket.

Respectfully Submitted,

/s/_____

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Dated: March 8, 2006